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16 Attorneys for Defendant APPLE INC.

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **OAKLAND DIVISION**

20 EPIC GAMES, INC.

Case No. 4:20-cv-05640-YGR-TSH

21 Plaintiff, Counter-defendant

**EXHIBIT A (REDACTED) TO
DECLARATION OF MARK A. PERRY IN
SUPPORT OF APPLE INC.'S STATEMENT
IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL**

22 v.

23 APPLE INC.,

24 Defendant, Counterclaimant

25 The Honorable Thomas S. Hixson

EXHIBIT A

(Redacted)

Production Dates of Parent Document (Folder Title)	Doc Number	Production Dates Beginning	Production Dates End	Custodians	Document Date	Document Time	From	To	Cc	Bcc	Subject	Original Name	Redact or Withhold	Privilege Type	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees Acting at the Direction of counsel	Special Master Determination (Priv - Yes; Priv - No)
Correspondence Involving Only Non-Legal Personnel																		
PRIV-APL-EG_00098215	2652	PRIV-APL-EG_00098215	PRIV-APL-EG_00098220	Savio, Alusa	2022-06-03	00:03:37						Personal messages Alusa Savio and Carolina Nugent 2022-06-03 (UTC).pdf	Redact	AttorneyClient	Document with redacted text reflecting legal advice from counsel regarding foreign regulatory issues in the European Union, including DMA.	Non-attorneys discussing questions for Apple legal and outside counsel.	Ling Lew (Apple in-house counsel)	Yes, except page 98218.
PRIV-APL-EG_00156327	832	PRIV-APL-EG_00156327	PRIV-APL-EG_00156334	Ajemian, Peter	2023-12-19	15:39:39	Archelle Thelmaque	Peter Ajemian	Adam Dema		Re: Sync re: JP2B Evaluation	20231219-0739 Re: Sync re JP2B Evaluation.eml	Redact	AttorneyClient	Email chain reflecting legal advice from counsel regarding injunction compliance requirements for link format and buttons.	Apple App Store in-house counsel	Apple App Store in-house counsel	Yes
Emails Primarily Discussing Business-Related Topics																		
PRIV-APL-EG_00157336	961	PRIV-APL-EG_00157336	PRIV-APL-EG_00157350	Bavaro, Sam	2024-05-17	15:48:11	Seema Shembekar	Ling Lew			Re: Pending StoreKit entitlement requests report	20240517-0848 Re: Pending StoreKit entitlement requests report.eml	Redact	AttorneyClient	Email chain with redacted text reflecting information for the purpose of rendering legal advice to counsel regarding foreign regulatory issues in Russia.	Email chain in which counsel seeks consistency updates regarding statistics for the App Store link programs in various countries, including United States and Russia, for the purpose of providing related legal advice.	Glenon Dunn (apple in-house counsel); Web Central and Managed (outside counsel); Jennifer Brown (Apple in-house counsel); Jenny Lee (Apple in-house counsel); Ling Lew (Apple in-house counsel); Sean Cameron (Apple in-house counsel); Stephanie Fine (Apple in-house counsel)	Yes
PRIV-APL-EG_00259982	11222	PRIV-APL-EG_00259982	PRIV-APL-EG_0025998	Ajemian, Peter; Thai, Ann; Bavaro, Sam	2024-05-17	18:07:37	Ling Lew	Peter Ajemian	Archelle Thelmaque		Re: EU alt marketplace // Apple + Bloomberg	20240517-1107 Re: EU alt marketplace -- Apple + Bloomberg.eml	Redact	AttorneyClient	Email chain with redacted text reflecting information for the purpose of obtaining legal advice from counsel regarding foreign regulatory issues in the European Union, including DMA.	Draft press statements sent to legal team for review and related reductions to third party edits that are necessary to protect the details of the content responded to by legal team.	Ling Lew (Apple in-house counsel); Brendan McNamara (Apple in-house counsel); Tom McNamara (Apple in-house counsel)	Yes
PRIV-APL-EG_00260161	11244	PRIV-APL-EG_00260161	PRIV-APL-EG_00260163	Kirtane, Latika; Thai, Ann	2023-11-28	06:19:20	Eric Albert	Ling Lew	Ann Thai	Fred Sainz	Re: DMA Comms Meeting	20231127-2219 Re: DMA Comms Meeting.eml	Redact	AttorneyClient	Email chain reflecting legal advice from counsel regarding injunction compliance requirements for link format and buttons.	Email chain with business team clarifications and legal team clarification and legal team providing input.	Ling Lew (Apple in-house counsel)	Yes
PRIV-APL-EG_00156271	819	PRIV-APL-EG_00156271	PRIV-APL-EG_00156273	Ajemian, Peter	2024-01-28	11:51:43	Brendan McNamara	Peter Ajemian			Re: Request for today: updated reactive materials	20240128-0939 Re: Request for today: updated reactive materials.eml	Redact	AttorneyClient	Email chain with redacted text providing information for the purpose of obtaining legal advice from counsel regarding foreign regulatory issues, press and communications legal strategy.	Brendan McNamara (Apple in-house counsel)	Brendan McNamara (Apple in-house counsel)	Yes